FISH.

FISH & RICHARDSON

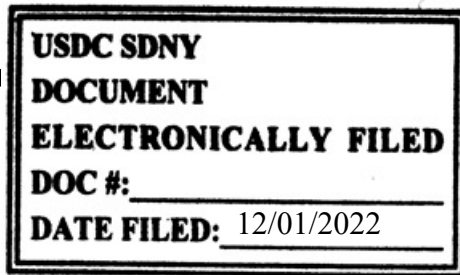USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:_____
DATE FILED: 12/01/2022

Fish & Richardson P.C.
500 Arguello Street, Suite 400
Redwood City, CA 94063

650 839 5070 main
650 839 5071 fax

VIA ECF

November 30, 2022

Esha Bandyopadhyay
Principal
bandyopadhyay@fr.com
+1 650 839 5088 direct

Hon. Katharine H. Parker
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

**Re: *Spectrum Dynamics Medical Limited (Plaintiff) v. GE et al. (Defendants);
Case No.: 18-cv-11386 (VSB)***

Dear Judge Parker:

Pursuant to Rule III(d) of your Honor's Individual Practices in Civil Cases and Your Honor's direction during the January 8, 2021 telephonic hearing (D.I. 176 at 37:18-20), Plaintiff Spectrum Dynamics Medical Limited, by and through counsel, respectfully requests permission to file under seal its Second Supplemental Table of Trade Secrets being filed herewith today, November 30, 2022.

Your Honor previously granted Spectrum's motions to file its original and First Supplemental Tables of Spectrum Trade Secrets under seal. (D.I. 188; D.I. 558.) Spectrum's Second Supplemental Table of Spectrum Trade Secrets, like the original and First Supplemental Tables of Spectrum Trade Secrets, contains Spectrum's highly confidential information and describes Spectrum's trade secrets.

For these reasons, Spectrum respectfully requests that the Court grant its request to file its Second Supplemental Table of Spectrum Trade Secrets under seal.

Respectfully Submitted,

/s/ Esha Bandyopadhyay

Esha Bandyopadhyay

cc: All counsel of record (via ECF)

APPLICATION GRANTED.
Plaintiff's motion to seal is narrowly tailored to protect potentially competitively sensitive information, consistent with *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006), and its progeny. Accordingly, Plaintiff's motion is granted and the document filed at ECF No. 601 may remain under seal.

SO ORDERED:

Katharine H Parker
HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE 12/01/2022

fr.com